

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

COACH USA, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11258 (MFW)

(Jointly Administered)

**NOTICE OF AGENDA FOR HEARING SCHEDULED  
FOR JULY 9, 2024 AT 3:00 P.M. (ET)**

The remote hearing will be conducted entirely over Zoom and requires all participants to register no later than **July 8, 2024 (ET) on 4:00 p.m. (ET)**.

All remote participants are required to register in advance using the *eCourtAppearances* tool (available on the Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>)). In the absence of extenuating circumstances, chambers typically will not provide Zoom links to those who fail to register by the deadline. **Please refer to the Court's website for further information and requirements.**

**YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM OR YOU WILL NOT BE ALLOWED INTO THE MEETING**

**ADJOURNED MATTERS**

1. Debtors' Motion for Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Secured Financing; (II) Authorizing the Debtors' Use of Cash Collateral; (III) Granting Adequate Protection to Prepetition ABL Administrative Agent and the Other Prepetition Secured Parties; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[D.I. 17, 6/12/24](#)]

- i. Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

**Related Documents:**

- A. Interim Order (I) Authorizing the Applicable Debtors to Obtain Postpetition Secured Financing; (II) Authorizing the Debtors' Use of Cash Collateral; (III) Granting Adequate Protection to Prepetition ABL Administrative Agent and the

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<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/CoachUSA>. The Debtors' mailing address is 160 S Route 17 North, Paramus, NJ 07652.

Other Prepetition Secured Parties; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[D.I. 79, 6/13/24](#)]

B. Notice of Adjourned Hearing [D.I. 168, 7/1/24]

Objections Filed:

A. Informal Response

i. Certain of the Debtors' Landlords

Status: This matter is adjourned to July 16, 2024 at 2:00 p.m. (ET).

2. Debtors' Motion for Entry of an Order (I) Extending Time to File Schedules and Statements of Financial Affairs, (II) Modifying the Requirements for Filing Monthly Operating Reports, and (III) Granting Related Relief [[D.I. 111, 6/20/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Related Documents: None.

Objections Filed:

A. Informal Response

ii. Office of the United States Trustee

Status: This matter is adjourned to July 16, 2024 at 2:00 p.m. (ET).

**MATTERS WITH CERTIFICATION OF COUNSEL  
OR CERTIFICATE OF NO OBJECTION**

3. Debtors' Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Utility Services, (II) Deeming Utility Companies Adequately Assured of Future Payment, (III) Establishing Procedures for Determining Additional Adequate Assurance of Payment, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [[D.I. 5, 6/11/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Related Documents:

A. Interim Order (I) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Utility Services, (II) Deeming Utility Companies Adequately Assured of Future Payment, (III) Establishing Procedures for Determining Additional Adequate Assurance of Payment, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [[D.I. 66, 6/13/24](#)]

B. Notice of Withdrawal of Objection of Certain Utility Companies [[D.I. 190, 7/3/24](#)]

C. Certification of Counsel [[D.I. 199, 7/3/24](#)]

Objections Filed:

A. Informal Response

i. Official Committee of Unsecured Creditors

B. Objection of Certain Utility Companies [[D.I. 145, 6/26/24](#)]

Status: A revised form of order has been submitted under certification of counsel. No hearing is necessary unless the Court has questions.

4. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Taxes and Fees and Related Obligations, (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [[D.I. 6, 6/11/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Related Documents:

A. Interim Order (I) Authorizing the Debtors to Pay Certain Prepetition Taxes and Fees and Related Obligations, (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [[D.I. 67, 6/13/24](#)]

B. Certification of Counsel [[D.I. 202, 7/3/24](#)]

Objections Filed:

A. Informal Response

i. Official Committee of Unsecured Creditors

Status: A revised form of order has been submitted under certification of counsel. No hearing is necessary unless the Court has questions.

5. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing (A) Payment of Prepetition Obligations Incurred in the Ordinary Course of Business in Connection With Insurance and Surety Programs, Including Payment of Policy Premiums, Broker Fees, and Claims Administrator Fees, and (B) Continuation of Insurance Premium Financing Programs; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [[D.I. 7, 6/11/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Related Documents:

- A. Interim Order (I) Authorizing (A) Payment of Prepetition Obligations Incurred in the Ordinary Course of Business in Connection With Insurance and Surety Programs, Including Payment of Policy Premiums, Broker Fees, and Claims Administrator Fees, and (B) Continuation of Insurance Premium Financing Programs; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [[D.I. 68, 6/13/24](#)]
- B. Certification of Counsel [[D.I. 201, 7/3/24](#)]

Objections Filed:

- A. Informal Response
  - i. Official Committee of Unsecured Creditors

Status: A revised form of order has been submitted under certification of counsel. No hearing is necessary unless the Court has questions.

- 6. Debtors' Motion for Interim and Final Orders (I) Authorizing Maintenance of the Cash Management System; (II) Authorizing Maintenance of the Existing Bank Accounts; (III) Authorizing Continued Use of Existing Business Forms; (IV) Authorizing Continued Performance of Intercompany Transactions in the Ordinary Course of Business and Grant of Administrative Expense Status for Postpetition Intercompany Claims; and (V) Granting Related Relief [[D.I. 9, 6/11/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Related Documents:

- A. Emergency Order Authorizing (A) the Limited Continued Use of the Debtors' Cash Management System and Existing Bank Accounts and (B) the Pre-Funding of Certain Prepetition Employee Obligations, on a Limited Basis, Pending First Day Hearing [[D.I. 24, 6/12/24](#)]
- B. Interim Order (I) Authorizing Maintenance of the Cash Management System; (II) Authorizing Maintenance of the Existing Bank Accounts; (III) Authorizing Continued Use of Existing Business Forms; (IV) Authorizing Continued Performance of Intercompany Transactions in the Ordinary Course of Business and Grant of Administrative Expense Status for Postpetition Intercompany Claims; and (V) Granting Related Relief [[D.I. 70, 6/13/24](#)]
- C. Certification of Counsel [[D.I. 200, 7/3/24](#)]

Objections Filed:

A. Informal Response

i. Official Committee of Unsecured Creditors

Status: A revised form of order has been submitted under certification of counsel. No hearing is necessary unless the Court has questions.

7. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Reject (A) an Unexpired Lease of Nonresidential Real Property and (B) an Executory Contract, in Each Case, Effective as of the Petition Date, (II) Abandon Any Remaining Personal Property, and (III) Granting Related Relief [[D.I. 10, 6/11/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Related Documents:

A. Re-Notice of Motion [[D.I. 86, 6/14/24](#)]

B. Certificate of No Objection [[D.I. 210, 7/3/24](#)]

Objections Filed: None

Status: A certificate of no objection has been filed. No hearing is necessary unless the Court has questions.

8. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Payment of Certain Prepetition Wages, Salaries, and Other Compensation; (II) Authorizing Certain Employee Benefits and Other Associated Obligations; (III) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[D.I. 11, 6/11/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Related Documents:

A. Emergency Order Authorizing (A) the Limited Continued Use of the Debtors' Cash Management System and Existing Bank Accounts and (B) the Pre-Funding of Certain Prepetition Employee Obligations, on a Limited Basis, Pending First Day Hearing [[D.I. 24, 6/12/24](#)]

B. Interim Order (I) Authorizing Payment of Certain Prepetition Wages, Salaries, and Other Compensation; (II) Authorizing Certain Employee Benefits and Other Associated Obligations; (III) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[D.I. 71, 6/13/24](#)]

C. Certification of Counsel [[D.I. 203, 7/3/24](#)]

Objections Filed:

A. Informal Response

i. Official Committee of Unsecured Creditor

Status: A revised form of order has been submitted under certification of counsel. No hearing is necessary unless the Court has questions.

9. Debtors' Motion for Entry of Interim and Final Order Establishing Certain Notice and Hearing Procedures for (I) Certain Transfers of Equity in (A) Project Kenwood Holdings, Inc., (B) Project Kenwood Intermediate Holdings I, Inc., (C) Project Kenwood Intermediate Holdings II, LLC and (D) Project Kenwood Intermediate Holdings III, LLC, and (II) Certain Claims of Worthlessness With Respect to the Foregoing Equity Interests [[D.I. 16, 6/11/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Related Documents:

- A. Interim Order Establishing Certain Notice and Hearing Procedures for (I) Certain Transfers of Equity in (A) Project Kenwood Holdings, Inc., (B) Project Kenwood Intermediate Holdings I, Inc., (C) Project Kenwood Intermediate Holdings II, LLC and (D) Project Kenwood Intermediate Holdings III, LLC, and (II) Certain Claims of Worthlessness With Respect to the Foregoing Equity Interests [[D.I. 73, 6/13/24](#)]

- B. Certification of Counsel [[D.I. 198, 7/3/24](#)]

Objections Filed:

A. Informal Response

i. Official Committee of Unsecured Creditors

Status: A revised form of order has been submitted under certification of counsel. No hearing is necessary unless the Court has questions.

10. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to File Under Seal the Asset Purchase Agreement by and Between Debtors, Bus Company Holdings US, LLC and 1485832 B.C. Unlimited Liability Company and (II) Granting Related Relief [[D.I. 95, 6/17/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Related Documents:

- A. Certificate of No Objection [[D.I. 211, 7/3/24](#)]

Objections Filed: None

Status: A certificate of no objection has been filed. No hearing is necessary unless the Court has questions.

11. Debtors' Application for an Order Authorizing the Employment and Retention of Alston & Bird LLP as General Bankruptcy and Restructuring Co-Counsel for the Debtors and Debtors in Possession Effective as of the Petition Date [[D.I. 102, 6/18/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Related Documents:

- A. Supplemental Declaration of J. Eric Wise in Support of Debtors' Application for an Order Authorizing the Employment and Retention of Alston & Bird LLP as General Bankruptcy and Restructuring Co-Counsel for the Debtors and Debtors in Possession Effective as of the Petition Date [[D.I. 194, 7/3/24](#)]
- B. Certification of Counsel [[D.I. 195, 7/3/24](#)]

Objections Filed:

- A. Informal Response
  - i. United States Trustee

Status: A revised form of order has been submitted under certification of counsel. No hearing is necessary unless the Court has questions.

12. Debtors' Application for an Order Authorizing the Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Co-Counsel for the Debtors, Effective as of the Petition Date [[D.I. 103, 6/18/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Related Documents:

- A. Notice of Filing of (I) Revised Proposed Order Authorizing the Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Co-Counsel to the Debtors, Effective as of the Petition Date and (II) the Supplemental Beach Declaration [[D.I. 167, 7/1/24](#)]
- B. Certification of Counsel [[D.I. 206, 7/3/24](#)]

Objections Filed:

- A. Informal Response
  - i. United States Trustee

Status: A revised form of order has been submitted under certification of counsel. No hearing is necessary unless the Court has questions.

13. Debtors' Application for an Order Authorizing the Retention and Employment of Kroll Restructuring Administration LLC as Administrative Advisor, Effective as of the Petition Date [[D.I. 104, 6/18/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Related Documents:

- A. Certificate of No Objection [[D.I. 209, 7/3/24](#)]

Objections Filed: None

Status: A certificate of no objection has been filed. No hearing is necessary unless the Court has questions.

14. Application of the Debtors for Entry of an Order Pursuant to 11 U.S.C. §§ 327 and 328(a), Fed. R. Bankr. P. 2014 and 5002, and Local Rules 2014-1 and 2016-2 Authorizing Retention and Employment of Houlihan Lokey Capital, Inc. as Investment Banker to the Debtors Effective as of the Petition Date [[D.I. 105, 6/18/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Related Documents:

- A. Certification of Counsel [[D.I. 205, 7/3/24](#)]

Objections Filed:

- A. Informal Response

- i. United States Trustee

Status: A revised form of order has been submitted under certification of counsel. No hearing is necessary unless the Court has questions.

15. Debtors' Motion for Entry of an Order Authorizing the Debtors (I) to Employ and Retain CR3 Partners, LLC to Provide Spencer Ware as Chief Restructuring Officer and Additional Personnel, as Necessary, Effective as of the Petition Date, and (II) Granting Related Relief [[D.I. 106, 6/18/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Related Documents:

- A. Certification of Counsel [[D.I. 204, 7/3/24](#)]



Objections Filed:

A. Informal Response

i. United States Trustee

Status: A revised form of order has been submitted under certification of counsel. No hearing is necessary unless the Court has questions.

16. Debtors' Motion for Entry of an Order Authorizing the Employment and Payment of Professionals Used in the Ordinary Course of Business [[D.I. 141, 6/25/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Related Documents:

A. Certification of Counsel [[D.I. 208, 7/3/24](#)]

Objections Filed:

A. Informal Responses

- i. Official Committee of Unsecured Creditors  
ii. United States Trustee

Status: A revised form of order has been submitted under certification of counsel. No hearing is necessary unless the Court has questions.

17. Debtors' Motion for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals, and (II) Granting Related Relief [[D.I. 143, 6/25/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Related Documents:

A. Certification of Counsel [[D.I. 207, 7/3/24](#)]

Objections Filed:

A. Informal Responses

- i. Official Committee of Unsecured Creditors  
ii. United States Trustee

Status: A revised form of order has been submitted under certification of counsel. No hearing is necessary unless the Court has questions.

18. Debtors' Motion for Entry of an Order (A) Establishing Bar Dates and Related Procedures for Filing Proofs of Claim (Including for Claims Arising Under Section 503(b)(9) of the Bankruptcy Code) and (B) Approving the Form and Manner of Notice Thereof [[D.I. 144, 6/25/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Related Documents:

- A. Certification of Counsel [[D.I. 197, 7/3/24](#)]

Objections Filed:

- A. Informal Responses

- i. United States Trustee

Status: A revised form of order has been submitted under certification of counsel. No hearing is necessary unless the Court has questions.

**CONTESTED MATTERS GOING FORWARD**

19. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Prepetition Claims of Certain Critical Vendors, 503(b)(9) Claimants, and Lien Claimants; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [[D.I. 12, 6/11/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Related Documents:

- A. Interim Order (I) Authorizing Debtors to Pay Prepetition Claims of Certain Critical Vendors, 503(b)(9) Claimants, and Lien Claimants; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [[D.I. 75, 6/13/24](#)]

Objections Filed:

- B. Informal Response

- ii. Official Committee of Unsecured Creditors

Status: This matter is going forward.

20. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Honor and Continue Certain Customer Programs and Customer Obligations in the Ordinary Course of Business; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [[D.I. 13, 6/11/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Related Documents:

- A. Interim Order (I) Authorizing Debtors to Honor and Continue Certain Customer Programs and Customer Obligations in the Ordinary Course of Business; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [[D.I. 72, 6/13/24](#)]

Objections Filed:

- A. Informal Response

- i. Official Committee of Unsecured Creditors

Status: This matter is going forward.

21. [REDACTED] Debtors' Motion for Entry of (A) an Order (I) Approving Bidding Procedures in Connection with the Sale of Substantially All of the Debtors' Assets, (II) Designating Stalking Horse Bidders and Stalking Horse Bidder Protections, (III) Scheduling Auction for and a Hearing to Approve the Sale of Assets, (IV) Approving Notice of Respective Date, Time and Place for Auction and for a Hearing on Approval of the Sale, (V) Approving Procedures for the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (VI) Approving Form and Manner of Notice Thereof, and (VII) Granting Related Relief; and (B) Orders Authorizing and Approving (I) the Sale of the Debtors' Assets Free and Clear of Liens, Claims, Rights, Encumbrances, and Other Interests, (II) the Assumption and Assignment of Certain Executory Contracts, and Unexpired Leases, and (III) Granting Related Relief [[D.I. 20, 6/12/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Related Documents:

- A. Declaration of John Sallstrom [[D.I. 21, 6/12/24](#)]
- B. [SEALED] Debtors' Motion for Entry of (A) an Order (I) Approving Bidding Procedures in Connection with the Sale of Substantially All of the Debtors' Assets, (II) Designating Stalking Horse Bidders and Stalking Horse Bidder Protections, (III) Scheduling Auction for and a Hearing to Approve the Sale of Assets, (IV) Approving Notice of Respective Date, Time and Place for Auction and for a Hearing on Approval of the Sale, (V) Approving Procedures for the Assumption

and Assignment of Certain Executory Contracts and Unexpired Leases, (VI) Approving Form and Manner of Notice Thereof, and (VII) Granting Related Relief; and (B) Orders Authorizing and Approving (I) the Sale of the Debtors' Assets Free and Clear of Liens, Claims, Rights, Encumbrances, and Other Interests, (II) the Assumption and Assignment of Certain Executory Contracts, and Unexpired Leases, and (III) Granting Related Relief [D.I. 23, 6/12/24]

C. Notice of Motion [[D.I. 43, 6/12/24](#)]

D. Notice of Filing of Revised Proposed Order [[D.I. 196, 7/3/24](#)]

Objections Filed:

A. Informal Response

i. Official Committee of Unsecured Creditors

Status: This matter is going forward.

22. Debtors' Motion for an Order Authorizing and Approving Procedures for the Sale, Transfer, or Abandonment of De Minimis Assets [[D.I. 101, 6/18/24](#)]

Objection Deadline: July 2, 2024 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to July 3, 2024 at 11:59 p.m. (ET)

Objections Filed:

A. Informal Responses

i. Official Committee of Unsecured Creditors  
ii. United States Trustee

Status: This matter is going forward.

Dated: July 5, 2024  
Wilmington, Delaware

**YOUNG CONAWAY STARGATT & TAYLOR,  
LLP**

/s/ Joseph M. Mulvihill

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Edmon L. Morton (No. 3856)  
Sean M. Beach (No. 4070)  
Joseph M. Mulvihill (No. 6061)  
Timothy R. Powell (No. 6894)  
Rebecca L. Lamb (No. 7223)  
1000 North King Street  
Rodney Square  
Wilmington, Delaware 19801  
Tel: (302) 571-6600  
Fax: (302) 571-1253  
Email: emorton@ycst.com  
sbeach@ycst.com  
jmulvihill@ycst.com  
tpowell@ycst.com  
rlamb@ycst.com

- and -

**ALSTON & BIRD LLP**

J. Eric Wise (*pro hac vice* admission pending)  
Matthew K. Kelsey (*pro hac vice* admission pending)  
William Hao (*pro hac vice* admission pending)  
90 Park Avenue  
New York, New York 10016  
Tel: (212) 210-9400  
Fax: (212) 210-9444  
Email: eric.wise@alston.com  
matthew.kelsey@alston.com  
william.hao@alston.com

*Proposed Counsel to the Debtors and Debtors in  
Possession*